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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION REGARDING DRAFT REMEDIAL INVESTIGATION REPORT POTENTIAL SOURCE OF CONTAMINATION 45 (PSC45) NAS JACKSONVILLE FL
3/11/2013
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION
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March 11, 2013

Ms. Adrienne Wilson
Code OPDE3/AW
Department of the Navy
Naval Facilities Southeast
Attn: Ajax Street, Building 135N
P.O. Box 30A
Jacksonville, FL 32212-0030

RE: Draft Remedial Investigation Report, Potential Source of Contamination 45, Naval Air Station Jacksonville, Jacksonville, Florida

Dear Ms. Wilson:

I have completed my review of the Draft Remedial Investigation Report, Potential Source of Contamination 45, Naval Air Station Jacksonville, dated December 2012 (received December 27, 2012), prepared and submitted by Tetra Tech, Inc. I have the following comments on the report:

(1) On page ES-4, third bullet, it states that carcinogenic risks for residential exposure to VOCs through vapor intrusion exceeded the Department's target risk level. The Department has not promulgated acceptable risk levels for inhalation of contaminants through vapor intrusion.

(2) On page ES-4, fifth and sixth bullet, it discusses carcinogenic risks for various exposures (i.e. maintenance worker, construction worker, adolescent trespasser, etc.), but does not state the media by which the exposure originates. Also, the word "noncarcinogenic" is misspelled in the fifth bullet.

(3) On page 6-10, Section 6.2.4, second paragraph, last sentence, it says that phthalate esters detected at the site are believed to be attributable to laboratory and field contamination rather than site related. Has there been evidence collected to demonstrate this or will this be investigated further?

(4) On page 7-1, Section 7.1, second paragraph, third sentence, it erroneously states that surface soils are understood to be not contaminated. As stated in Section 4.3.2, soil samples were collected from 0.5 to 2.5 feet below land surface and many of these samples were determined to be contaminated. As the Department defines surface soils for the purpose of direct exposure to be from between 0 and 2 feet below land surface, the

contamination detected in the samples collected should be discussed as being available for direct exposure.

(5) Table 7-1 should provide the Occurrence, Distribution and Selection of COPCs through Direct Soil Contact, but actually is the same as Table 8-1, which is the Development of Ecological COPCs in the Upper Layer of the Surficial Aquifer.

(6) In Table 7-6, the information provided with respect to FDEP GCTLs in the bottom part of the table appears to be in error. The Department does not distinguish between receptors in calculating GCTLs.

(7) In Table 7-7, there should not be an Exposure Point Concentration for benzo(a)pyrene equivalents for groundwater. Each individual PAH has its own GCTL and the use of Toxicity Equivalent Factors is not applied to groundwater concentrations.

(8) On page 8-2, second paragraph, fourth sentence, it says that contaminated subsurface soil does not provide a complete pathway for ecological receptors. As discussed in comment (4), soil samples were collected from 0.5 to 2.5 feet below land surface and if this soil is uncovered with asphalt or concrete, this soil would be available for contact with burrowing ecological receptors.

(9) In Section 7.3.2, it says that the results from DPT locations are attributable to another source and data from those locations were excluded from COPCs for groundwater. However, contaminants from those locations, specifically carbon tetrachloride, are discussed in detail in the ecological risk assessment.

(10) On page 9-2, Section 9.1.1, first paragraph, fifth sentence, same as comment (1) above.

(11) On pages ES-6, second paragraph, 8-8, third paragraph, and page 9-3, first paragraph, it discusses the surface water point of exposure as outside the "mixing zone" as Chapter 62-302.530, F.A.C., states that surface water quality criteria are "to be applied except within zones of mixing". The Department's cleanup rule, Chapter 62-780, F.A.C., does not allow for mixing zones and their use for determining acceptable discharge concentrations from infiltration to the stormsewer system at Naval Air Station Jacksonville is prohibited.

(12) In the determination of chemicals of potential concern (COPCs), background concentrations of inorganic chemicals are usually used to screen out contaminants before they become COPCs. Cobalt is described throughout the document as a COPC or a chemical of concern (COC). However, the background screening concentration of cobalt (Appendix D) is higher than what was detected in the Remedial Investigation. Other inorganic chemicals should also be screened against background screening values.

(13) I have the following editorial comments:

a. On page ES-2, second paragraph, first sentence, the word "indicates" is misspelled.
b. On page 4-14, Section 4.7, first paragraph, first sentence, add the word "in" between the words "identified" and "the".
c. \On page 5-12, Section 5.3.3, third sentence, add the word "of" between the words "summary" and "the".
d. On page 5-20, first paragraph, third sentence, remove the word "was".
e. On page 5-23, top of the page, first line, please revise the sentence by either removing the word "turning" or adding the word "and" between the words "turning" and "joining".
f. On page 7-5, first paragraph, second sentence, the word "noncarcinogenic" is misspelled.

If you have any questions regarding this letter, please contact me at (850) 245-8997.

Sincerely,

David P. Grabka

David P. Grabka, P.G.
Remedial Project Manager
Federal Programs Section
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